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13 *Counsel for Defendants*
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MAXWELL V.
PRITT IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL WAYMO TO
SUPPLEMENT RFA &
INTERROGATORY RESPONSES AND
TO PRODUCE AN UNREDACTED
DOCUMENT**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

I, Maxwell V. Pritt, declare as follows:

1. I am counsel at the law firm of Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the State of California. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Uber’s Administrative Motion to File Under Seal Exhibits to Their Motion to Compel Waymo to Supplement RFA & Interrogatory Responses and to Produce an Unredacted Document.

2. I have reviewed the following exhibits and only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief to Compel RFA& Interrogatory Responses (“Letter Brief”)	Highlighted Portions	Plaintiff
Exhibit 1 to the Pritt Declaration ISO Letter Brief to Compel RFA& Interrogatory Responses (“Pritt Declaration”)	Entire Document	Plaintiff
Exhibit 2 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 3 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 5 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 6 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 7 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 8 to the Pritt Declaration	Entire Document	Plaintiff

3. The highlighted portions of the Letter Brief and the entirety of Exhibits 1, 2, 3, 5, 6, 7, and 8, contain information that I understand Waymo designated or may consider to be “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order in this case.

4. Uber’s request to seal is narrowly tailored to information Waymo designated or may consider “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order, or asked to be sealed.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st
2 day of August, 2017 at Oakland, California.

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4 BOIES SCHILLER FLEXNER LLP

5 By: /s/ Maxwell V. Pritt
6 Maxwell V. Pritt
7

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9 **ATTESTATION OF E-FILED SIGNATURE**

10 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
11 document. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has
12 concurred in this filing.

13 Dated: August 31, 2017

14 /s/ Karen L. Dunn
15 Karen L. Dunn
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